

**BAKER & HOSTETLER LLP**

45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
dsheehan@bakerlaw.com  
Marc E. Hirschfield  
mhirschfield@bakerlaw.com  
James W. Day  
Email: jday@bakerlaw.com

Hearing Date: November 30, 2011 at  
10:00 a.m.

Objection Deadline: November 16, 2011  
at 5:00 p.m.

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

**NOTICE OF TRUSTEE'S MOTION FOR ENTRY OF AN ORDER ESTABLISHING  
NOTICE PROCEDURES**

**PLEASE TAKE NOTICE** that upon the attached Motion for Entry of an Order Establishing Notice Procedures (the "Motion") of Irving H. Picard, as trustee (the "Trustee") for the liquidation of the business of Bernard L. Madoff Investment Securities LLC, under the

Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the substantively consolidated estate of Bernard L. Madoff, the undersigned will move for entry of a proposed order (substantially in the form annexed to the Motion, the “Proposed Order”) before the Honorable Burton R. Lifland, United States Bankruptcy Judge, on **November 30, 2011 at 10:00 a.m. (the “Hearing”)**.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Motion **must**:

(i) be made in writing; (ii) conform to the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure, the Local Bankruptcy Rules for the Southern District of New York and other applicable rules and guidelines; (iii) be filed, in accordance with General Order M-399, electronically with the Bankruptcy Court, with a hard copy marked “Chambers Copy” delivered, pursuant to Local Rule 9070-1, to the Chambers of the Honorable Burton R. Lifland, One Bowling Green, New York, New York 10004, and (iv) be served upon the following: (a) Baker & Hostetler LLP, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan, Esq.; and (b) Securities Investor Protection Corporation, 805 Fifteenth Street, N.W., Suite 800, Washington, D.C. 20005, Attn: Kevin H. Bell, Esq., so as to be received no later than **November 16, 2011 at 5:00 p.m. (the “Objection Deadline”)**.

**PLEASE TAKE FURTHER NOTICE** that any party objecting to the Motion must attend the Hearing, and failure to attend in person or by counsel may result in relief being granted without further notice or hearing. The Hearing date may be adjourned from time to time without further notice; parties are advised to review the docket in the above-captioned case or contact Nikki Landrio at [nlandrio@bakerlaw.com](mailto:nlandrio@bakerlaw.com) to determine whether the date of the Hearing has changed. The Trustee reserves his right to amend or modify the Proposed Order prior to the Hearing.

Dated: New York, New York  
October 20, 2011

BAKER & HOSTETLER LLP

By: /s/ Marc E. Hirschfield  
Baker & Hostetler LLP  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Marc E. Hirschfield  
Email: mhirschfield@bakerlaw.com  
James W. Day  
Email: jday@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff  
Investment Securities LLC and Bernard  
L. Madoff*